

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK  
POUGHKEEPSIE DIVISION

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In re:

NEW YORK MILITARY ACADEMY,  
  
Debtor.

Chapter 11

Case No. 15- 35379 (CGM)

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**NOTICE OF MOTION FOR AN ORDER MODIFYING  
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(D)(1)**


**PLEASE TAKE NOTICE** that Advanced Learning Group, LLC, by and through its counsel, Bond, Schoeneck & King, PLLC, will move before the Honorable Cecelia G. Morris, Chief United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, United States Courthouse, 355 Main Street, Poughkeepsie, New York on the 21st day of April, 2015 at 10:50 a.m., or as soon thereafter as counsel can be heard, for an Order, pursuant to 11 U.S.C. § 362(d)(i), granting Advanced Learning Group, LLC an Order Modifying the Automatic Stay to the extent necessary to allow its counterclaim to proceed against New York Military Academy (the “Debtor”) in the New York State Supreme Court for Orange County as asserted in the action captioned *New York Military Academy v. NewOpen Group et al.*, Index Number 5948/2013, and granting such other and further relief as this Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that all affidavits and memoranda in opposition to the relief requested, if any, shall be filed with the Bankruptcy Court Clerk’s

Office, Southern District of New York (Poughkeepsie Division) and served upon the undersigned counsel for the Debtor, no later than seven (7) days prior to the hearing date, in accordance with Local Bankruptcy Rule 9006-1(b).

Dated: March 31, 2015  
Syracuse, New York

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